

In the United States Court of Federal Claims

Megan Whittington

Plaintiff(s),

v.

THE UNITED STATES,

Defendant.

The Shenandoah County Juvenile & Domestic Relations Court, The Shenandoah County Department of Social Services

21-1801 C

Case No. _____

Judge _____

COMPLAINT

Your complaint must be clearly handwritten or typewritten, and you must sign and declare under penalty of perjury that the facts are correct. If you need additional space, you may use another blank page. A fillable pdf is available at <http://uscfc.uscourts.gov/filing-a-complaint>.

If you intend to proceed without the prepayment of filing fees (*in forma pauperis* (IFP)), pursuant to 28 U.S.C. § 1915, you must file along with your complaint an application to proceed IFP.

- 1. JURISDICTION.** State the grounds for filing this case in the United States Court of Federal Claims. The United States Court of Federal Claims has limited jurisdiction (*see e.g.*, 28 U.S.C. §§ 1491-1509).

Violation of Constitutional and Fundamental Liberty and Interests of the care of my child Unconstitutional Infringement on Fundamental Rights in Violation of Rights to Family Integrity and Due Process of Law in a Pattern of Legal Error, Bill of Rights 8, 9, 11 all violated Guaranteeing Fair Procedure and non-arbitrary action violating Substantive and Procedural Due process of law Section 242 of Title 18 makes it a crime for a person acting under color of any law to willfully deprive a person of a right or privilege that is protected by the Constitution. The Conduct of State Officials, Commonwealth Attorney, Brian Layton, Judge Chad Logan, and DSS Stephanie Danner (no longer employed with LDSS) causing Deprivation of Rights, Unreasonable Search and Seizure, Violating Fourth Amendment with malicious intentions causing Deprivation of Constitutional Rights and Federal Constitutional Rights to Not ever receiving Due Process, Infringed Under Color of State Law, Equal Protections Rights.

Continued Page A-6

4. STATEMENT OF THE CLAIM

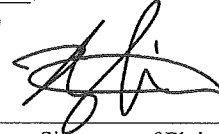
County DSS, coercively removed my son by immediately threatening me that my son would be placed in foster care, with no pre-deprivation hearing, despite the fact that there was no evidence of abuse, neglect, or any danger to my son faced at home. Violating Procedural Due Process. I was given no explanation of any charges against me and I continue to face conviction. Judge Logan's harsh treatment has deprived my family of due process, refusing to hold a normal trial and allowed the unlawful seizure of my son, violating the Commerce Clause. For more than ten months I continue to be deprived of Life and Liberty not ever being informed of grounds in which were found to justify the actions of Stephanie Danner Shenandoah County, former FSS with no trial ever offered, my son was 16 at the time and was not even allowed to give testimony. LDSS did not ever make a required home visit to ensure my son's safety and made no efforts to prevent or eliminate the need for removal. Violating my son's right to Family Integrity. We were denied Fundamental Rights and given no due process after the immediate removal of my son. Depriving me of life and liberty causing severe mental pain and suffering from pain reaching an intolerable intensity, feeling of complete emptiness. Shenandoah County Department of Social Services was not in compliance with Federal requirements, never filing a petition for removal and treating the matter as an emergency allowing me only supervised visitations without justification, completely restricting my ability to be alone with my son. The Commonwealth of Virginia never allowed an initial hearing alleging maltreatment, or abuse to determine whether my son should have ever been removed. I was never shown any substantial or credible evidence against me. I have received no information regarding this issue. I was never provided notice of any charges against me. Leaving me completely unsure of what was expected of me. There was no court order requiring anything from me other than to attend meetings set by LDSS. I was not provided with an opportunity to defend myself regarding any matter against me in a meaningful way at a meaningful time. I was told I remain in full custody of my son, Stephanie Danner made recommendations that I only have supervised visitation with my 17-year-old son, as well as admit myself into an inpatient rehab with no drug-related history and not having an addiction to any drugs and no evidence against me, Stephanie Danner recommendations were not evaluated with no recommendations made that followed any logical reasoning. Stephanie Danner's conduct was extreme and outrageous causing irreparable damage, inflicting emotional and mental distress, and what she has done to my family causing detrimental harm and irreparable damage-causing extreme mental and emotional distress. Most recently I was convicted wrongfully and wrongfully arrested. It has been nearly a year, and my son has not been to the dentist and other doctor visits have been placed on hold, showing a complete disregard for my son.

5. RELIEF. Briefly state exactly what you want the court to do for you.

I am seeking Immediate relief of the Fugitive status due to False allegations that have been persued with no probable cause or evidence to support a court order. I also ask that my son Alic, 17 years old is assured he may return home. Please allow this extreme and outrageous process of legal terror to end I have been victimized for nearly a year not allowed to be with my son with no hearing ever scheduled PLEASE HELP ME

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 31 day of August, 2021.
(day) (month) (year)



Signature of Plaintiff(s)